

## EXHIBIT 2

### REQUESTS STILL IN DISPUTE IN CONNECTION WITH TRUSTEE'S FIRST SET OF REQUESTS FOR ADMISSION TO DEFENDANT STANLEY SHAPIRO

- Those Requests to which there is no dispute between the parties are omitted from below.
- Those Requests which the Trustee is holding in abeyance are also omitted from below.
- Those Requests the Trustee maintains as originally drafted are repeated below.

### RELEVANT DEFINITIONS

2. The “**Portfolio Account**” means BLMIS Account No. 1SH030, which at various times had one or more subaccounts, including 1-SH030-3, 1-SH030-4, and 1SH030-8, and was originally numbered Account No. 1-03066, and which at various times had one or more subaccounts, including 1-03066-3-0 and 1-03066-7-0.

3. The “**Split-Strike Account**” means the BLMIS Account No. 1SH171, which at various times had one or more subaccounts, including 1-SH171-3-0 and 1SH171-4-0.

4. “**BLMIS**” means Bernard L. Madoff Investment Securities LLC.

5. “**Transfer(s)**” means any conveyance, transmittal, disposition, remittance, payment, or payments made by BLMIS by any means including, but not limited to, cash, funds, property, or other value conveyed by check, wire transfer, debit, credit to an account, the return of property, withdrawal from either the Portfolio Account or the Split-Strike Account, or by any other manner as set forth under section 101(54) of the Bankruptcy Code or section 270 of the New York Debtor & Creditor Law.

6. “**You**” or “**your**” means, or refers to, Stanley Shapiro.

7. “**Leslie S. Citron**” means your daughter, Leslie Shapiro Citron.

**REQUESTS FOR ADMISSION IN DISPUTE**

26. Admit that attached hereto as **Exhibit 4** is a true and accurate copy of a note which, although it may contain other handwriting, was written by you, in your capacity as trustee of, among other trusts, the Leslie Shapiro 1985 Trust.

27. Admit that as set forth in the note, a copy of which is attached hereto as **Exhibit 4**, you instructed BLMIS to begin, as of January of 1998, making monthly distributions or Transfers in the amount of \$7,500.00 from the Portfolio Account.

33. Admit that attached hereto as **Exhibit 6** is a true and accurate copy of a note which, although it may contain other handwriting, was written by you, in your capacity as trustee of, among other trusts, the Leslie Shapiro 1985 Trust.

34. Admit that as set forth in the note, a copy of which is attached hereto as **Exhibit 6**, you instructed BLMIS to begin, as of January 1, 2000, making monthly distributions or Transfers in the amount of \$10,000.00 from the Portfolio Account.

42. Admit that in April of 2003, you arranged for BLMIS to wire the sum of \$1,250,000.00 into a bank account held either solely or jointly in Leslie S. Citron's name from the Portfolio Account.

51. Admit that attached hereto as **Exhibit 14** is a true and accurate copy of a note which, although it may contain other handwriting and a copy of a blank check with word "VOID" written on it, was written by you.

52. Admit that in the note, a copy of which is attached hereto as **Exhibit 14**, you instructed BLMIS to wire on July 21, 2004 certain funds from the Portfolio Account and certain funds from the Split-Strike Account into a bank account held in Leslie S. Citron's name.

55. Admit that in or about December of 2005, you caused BLMIS to reportedly transfer the sum of \$1,700,600.00 from the Portfolio Account into the Split-Strike Account.